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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

18 FEB 1993

Docket File
Rm: 222
POLICY & PLANNING
BRANCH ROOM 5202

IN REPLY REFER TO:

7330-7/1700A3

RECEIVED

MAR -9 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable Bud Cramer
House of Representatives
1318 Longworth Building
Washington, D.C. 20515

Dear Congressman Cramer:

This is in reply to your letter of February 1, 1993, in which you inquired on behalf of several of your constituents regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

Those rules have been in place for over 20 years. While they have been amended on numerous occasions since that time, they nonetheless embody regulatory concepts based on yesteryear's technology and, unless changed, will stifle the growth and development of private land mobile radio technology and services, which are used primarily by local governments, public safety entities, and businesses to enhance their productivity. The Commission issued the Notice, therefore, to solicit comment from all interested persons on a wide variety of proposals designed to increase channel capacity, to promote more efficient use of these channels, and to simplify the rules governing use of these channels.

The proposals in the Notice reflect to a large extent concepts and proposals submitted in the initial inquiry stages of this proceeding. None of the proposals set forth in the Notice, however, are engraved in stone. Indeed, the proposals represent our best judgment at this stage of the proceeding on steps that must be taken to improve the regulatory climate for users of the private land mobile radio spectrum below 512 MHz. To this end, some of the critical issues that must be resolved relate to channel spacing, the amount of time provided to users to convert to new technical standards, how the 300 to 500 percent increase in channel capacity should be licensed, how the rules should be written to provide users technical flexibility, and whether the current nineteen radio services should be consolidated and, if so, how. I have enclosed for your information a copy of that part of the Notice that describes the numerous proposals.

Your constituents are specifically concerned about the impact of these changes on radio control (R/C) hobby users. Enclosed is a discussion paper concerning our proposals for the 72-76 MHz band. In short, we expect there would be no adverse impact on R/C operations because of any proposal contained in the Notice.

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16

Honorable Bud Cramer

2.

We are, of course, sensitive to the concerns of both users of private land mobile radio spectrum and R/C hobbyists. We will, therefore, take into careful consideration all their comments. Your constituents' concerns will be fully evaluated when we develop final rules in this proceeding. As indicated in the Notice, we remain convinced that without significant regulatory change in radio operations in the bands below 512 MHz, the quality of communications in the private land mobile radio services will continue to deteriorate to the point of endangering public safety and the national economy.

We want to thank you for your interest in this proceeding. Comments on the proposals set forth in the Notice are due May 28, 1993, and Reply Comments are due July 14, 1993. We expect final rules to be issued in 1994. We urge your constituents to file formal comments on all aspects of the proposals.

Sincerely,

Beverly H. Saker

for

Ralph A. Haller
Chief, Private Radio Bureau

Enclosures:

Notice

Order

Discussion paper

cc:

Chief, PRBureau

Chief, LM&M Divison

Docket Files, Room 222

P&P Branch File (Pink)

CNTL NO - 9300446

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CONGRESS/9300446

Congressional

DUE OBC: 2-17-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,
AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM 02/08/93

LETTER REPORT

CONTROL NO.	DATE RECEIVED	DATE OF CORRESP	DATE DUE	DATE DUE OLA(857)
9300446	02/08/93	02/01/93	02/19/93	

TITLE	MEMBERS NAME	REPLY FOR SIG OF
Congressman	Bud Cramer	BC

CONSTITUENT'S NAME	SUBJECT
several constituents	inq. comments on PR Docket 92-235

REF TO	REF TO	REF TO	REF TO
PRB <i>mm</i>			
<i>2-10-93</i>			
DATE	DATE	DATE	DATE
02/08/93			

REMARKS:

RECEIVED
FEB 10 2 04 PM '93
PRIVATE

BUD CRAMER
5TH DISTRICT, ALABAMA

COMMITTEE ON PUBLIC WORKS
AND TRANSPORTATION
COMMITTEE ON SCIENCE,
SPACE, AND TECHNOLOGY
SELECT COMMITTEE ON
CHILDREN, YOUTH, AND FAMILIES

PKB
92-235
446
Congress of the United States

House of Representatives

Washington, DC 20515-0105

February 1, 1993

1318 LONGWORTH BUILDING
WASHINGTON, DC 20515-0105
(202) 225-4801

403 FRANKLIN STREET
HUNTSVILLE, AL 35801
(205) 551-0190

737 EAST AVALON AVENUE
MUSCLE SHOALS, AL 35661
(205) 381-3450

MORGAN COUNTY COURTHOUSE
Box 668
DECATUR, AL 35602
(205) 355-9400

Mrs. Lou Sizemore
Congressional Liaison Specialist
Federal Communications Commission
1919 M St NW Ste 857
Washington, D.C. 20554-0002

Dear Mrs. Sizemore:

Please find the enclosed collection of letters that I have received regarding Federal Communications Commission (FCC), PR Docket 92-235 currently under consideration by the FCC.

I am respectfully requesting that you peruse the enclosed letters and supply me with written documentation addressing the concerns raised by my constituents. Furthermore, I am respectfully requesting that you provide me with any information available regarding PR Docket 92-235 in order to keep my interested constituency informed as to the status of this Docket.

Thank you for your time and consideration.

Sincerely,



Bud Cramer
Member of Congress

BC:nrb

Enclosure

RECEIVED
FEB 10 2 04 PM '93
PRIVATE

19 January 1993

The Honorable Robert Cramer
United States House of Representatives
Washington, D.C. 20515

JAN 26 1993

Dear Mr. Cramer,

I am currently serving as President of the North Alabama Radio Control Association (NARCA), Huntsville, Alabama. As such, I am an active participant in the building and operating of radio controlled aircraft. I am writing to you about a very serious concern that I have about a proposed rules change that is currently under consideration by the Federal Communications Commission (FCC), PR Docket 92-235. This rules change (if adopted) will greatly impact the use of radio frequencies allocated for use of radio controlled aircraft and subsequently increase the risk of accidents and personal injury not only to those directly involved with the hobby, but innocent bystanders (wives, children, friends, spectators, etc.), as well.

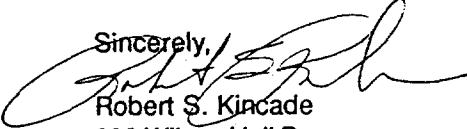
I am currently employed by Westinghouse Electric Corporation, in Huntsville, Alabama. I am the Program Manager for Unmanned Ground Vehicle programs for Westinghouse, a subgroup of the Unmanned Systems Division. This group also develops unmanned aerial vehicles (UAVs) for the military and commercial customer, alike. I state this, because of the correlation of the radio controlled aircraft hobby and the development of like systems for our national defense. Our "drone" pilots are RC enthusiasts, and their training stems from this hobby. Both of our unmanned systems, air and ground, use hobby-type equipment in the early prototyping stage. The RC hobby has had a great influence on aviation history and it would be a shame to curtail this lineage for the sake of further commercialization.

Our radio control frequencies are in the 72-76 MHz band. This band has been shared with private land mobile dispatch operations for quite some time. Since our frequencies are far enough apart, there has been little interference problems. However, with this proposed rules change the number of frequencies allocated to private mobile dispatch will be increased and therefore decrease the separation between their frequencies and ours. Since the dispatchers operate at much higher power output ranges, our aircraft will be susceptible to interference, resulting in loss of property and potentially personal injury. I, along with many of my friends, have a significant dollar investment (several thousand dollars) in this hobby. However, it is not the money that I fear is in jeopardy, its the potential for loss of life, or personal injury that should be considered in this matter.

I do not think it wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio controlled modelers. The hobby provides may hours of enjoyment to thousands of people like myself and contributes to the advancement and development of military and commercial aviation.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHZ band.

Sincerely,


Robert S. Kincaide
206 Wilson Hall Dr.
Madison, AL 35758

1426 Monte Sano Blvd.
Huntsville, Alabama 35801
18 January, 1993

Congressman Robert E. Cramer
1431 Longworth House Office
Washington, D.C. 20515

JAN 20 1993

Dear Congressman Cramer:

I am writing you in reference to the Federal Communications Commissions notice of Proposed Rule Making (NPRM) PR Docket 92-235. The proposed rules would interleave private land dispatch operations between already narrow frequencies allocated for control of model aircraft. The current model aircraft control frequencies in the band from 72 to 76 Mhz and are currently shared with private land mobile services and the current allocations have proven to be adequate to prevent interference between the users.

The FCC is proposing to allocate much narrower bandwidths and as a result there is no doubt that potential disastrous interference to the model aircraft control frequencies will result in loss of control of these aircraft in flight. These aircraft can weigh in excess of 30 pounds and travel over 100 miles per hour **resulting a very hazardous situation** since the aircraft are frequently flown in areas where many people gather to participate or watch. As you probably know, in Huntsville the old airport is used as a model flying field and is shared with several soccer and baseball fields, a golf course, jogging trails, the city stadium and other activities as well as being near housing and commercial areas. Very strict rules are enforced to ensure no interference between flyers but with the proposed situation., no control can be exercised over the new users and **loss of control will occur.**

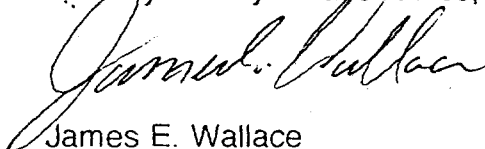
The hobby is enjoyed by well over a million people in this country and is very popular in Huntsville. There is a significant investment in equipment that will be severely compromised with up to 60 % being unusable without serious risk.

Put simply, the proposal is technically and operationally unsound, will create a serious hazard and will impact the pleasure and learning experience of people from middle school years to senior citizens. There are many spin offs from the hobby in the knowledge gained in construction of the aircraft, electronics, and association between diverse age groups and backgrounds.

I solicit your assistance in assuring that the FCC will not be allowed to carry out this very ill conceived and technically flawed plan. I fully understand that frequency spectrum is at a premium, that there is significant pressure from commercial and private special interest groups to acquire spectrum for their use.

I am a practicing electrical engineer with 35 years experience and would be happy to provide you with the technical data to substantiate the above if you so desire.

Thank you for your assistance,


James E. Wallace

ERNIE DUFFEY, CPA

679 Kelly Spring Rd.
Harvest, Alabama 35749
(205) 859-5786

January 20, 1993

The Honorable Bud Cramer
1431 Longworth Building
Washington, DC 20515-0105

Re: FCC Proposed Rules - PR Docket 92-235

JAN 27 1993

Dear Congressman Cramer:

I am an active member in our local radio control flying club of 51 members. I have been involved in the hobby since 1980. I derive many hours of enjoyment and education from this hobby. I also have a considerable investment in my aircraft, engines, radios and other equipment.

Obviously, the most important part of the aircraft for safety to myself, other people and surrounding personal and real property is the radio. More specifically, it is essential that the airborne radio system properly interpret and convert my instructions from the ground to the plane's control surfaces to maintain safe flying characteristics.

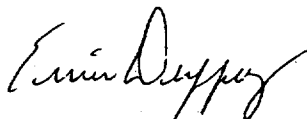
I now understand that the FCC intends to infringe on the frequencies I use by splitting the frequencies into narrower bandwidths and rearranging the band plan for use by land mobile operators. As a result, the land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. This endangers people and property.

In 1986 we were granted 50 frequencies to be phased in over a five year period ending December 31, 1990. The "1991 plan" caused the many R/C flyers in the nation (approximately 180,000 members of the Academy of Model Aeronautics, alone) to spend considerable amounts of money upgrading radios to narrower bandwidths or completely replacing them. Under the "1991 plan" we went from 80 khz spacing to 40 khz to 20 khz spacing. The "1991 plan" has only been in full force and effect for two years.

Now the FCC wants to narrow us further. This is a very costly proposition. I understand that only 19 of the 50 frequencies granted will be useable if this proposal is passed. More specifically, none of my personal equipment will be useable. That represents a loss of about \$1,000 to myself. It doesn't take long to figure the cost to 180,000 other R/C flyers. I am willing to guess that many millions of dollars were already spent by R/C flyers in the "1991 plan" over the five year phase-in.

Please do not let them pass this proceeding. PR Docket 92-235 is expensive to R/C flyers and dangerous to the public.

Sincerely,



Ernie Duffey, CPA

JAN 27 1993

Congressman Bud Cramer
1431 Longworth Building
Washington, D.C. 20515

Jan 21. 1993

Subject: ^{FCC} NPRM PR Docket 92-235

Dear Congressman Cramer,

I have just learned that there is consideration for restructuring the frequency allocation for Radio Control Model Aircraft in the 72 - 76 Mhz bands. I am, to say the least, upset that such would even be considered.

The RC aircraft hobby and industry have just finished development, qualification, production and distribution of the new narrow band equipment necessary to utilize the new channels given us two or three years ago. Needless to say, this effort represents a sizable investment by the tens of thousands of RC enthusiasts as well as the industry and sales and distribution system.

Ther proposal to allow relatively high power mobile transmissions would force much of the new investment to be lost because even our best receivers are not capable of discriminating against signals which are nominally as close as 2.5 Mhz to our assigned channels since our transmit power levels are only a few hundred mw.

RC modelers who attempt to continue flying under the proposed conditions will be subject to being "shot down". That is, they will lose control of their planes in flight at unpredictable times. Since our planes typically weigh five to ten pounds and fly at speeds of 50 to 150 mph, safety dictates that they be under control at all times.

The RC club in Huntsville to which I belong stresses safety to avoid human injury, damage to property and of course damage to our aircraft and associated equipment.

It would appear that the proposal is conceived without regard to the financial loss to our industry and hobby and to the safety of our pilots and spectators. Furthermore it reverses an allocation change decision which was just made.

If the FCC insists upon further consideration of 92-235, I believe that somebody owes the RC community the results of studies showing what impact the proposed changes might have with respect to damage to the hobby and industry, safety ramifications and its liabilities. If such studies have not been performed, I suggest that they are in order.

Sincerely,

Merph Ellis

Merph Ellis
177 Stoneway Trail
Madison, Al 35758

The Honorable Robert Bud Cramer
1431 Longworth House Office Building
Washington, DC 20515

January 14, 1992

JAN 22 1993

Dear Mr. Robert Bud Cramer:

I am active in radio control airplane modeling and flying. I have been enjoying the sport for over a year now, and would very much like to continue. I spend approximately 15 to 20 hours a week building and flying model airplanes. It helps me occupy my leisure time, gives me a feeling of achievement, and is also great fun.

The reason for this letter is because I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). (The proceeding is PR Docket 92-235). If adopted, the new rules will reduce the usability of frequencies currently assigned for model use, and increase the risk of accidents and attendant liability for controlling model airplanes.

The radio control frequencies we use are in the 72-76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies so that we have been able to share the band without either use interfering with the other.

With the FCC Docket splitting the mobile frequencies into narrower band widths, many land mobile frequencies will move closer to the radio control frequencies. This will cause interference to radio control operation for 31 of the 50 frequencies available, and leave only 19 frequencies for safe use.

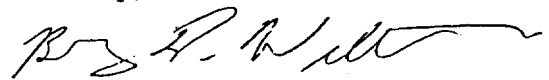
Many safety precautions are taken when flying remote control aircraft to assure the safety of the operator, bystanders, and the protection of property. One of the most important safety precautions is the careful coordination and use of radio control frequencies. With the number of usable frequencies reduced as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly reduced.

A remote control aircraft, weighing 5 to 20 pounds, capable of speed of a 100 mile per hour or more, that goes out of control due to radio interference is not discriminating of what or whom it crashes into. A crash can cause property damage, serious injury or even death. The full complement of radio frequencies are needed in order to assure a safe flying environment.

I do not think it is wise for the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself, and contributes to the advancement and development of the commercial aviation industry.

Please help me continue in the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,



Barry Williams

January 15, 1993

JAN 22 1993

The Honorable Robert E. Cramer, Jr.
Suite #1431
Longworth House Office Building
Washington, D.C. 205150

Dear Representative Cramer:

I am a fifty one year young public school teacher with thirty years of instrumental and vocal music instruction to my credit. Twenty six of those years were devoted to Senator John Sparkman High School, 2697 Carter Gln Rd., Toney, Alabama, 357753; erected in 1958 and named after the honorable Senator John Sparkman. We have done good things here at Sparkman including the enlistment of our 1992 band drum major, Jonathan Schmitz, into the U.S. Naval Academy, Annapolis, Maryland.

Allow me to describe a potential safety hazard for the general public of states whose use of radio frequencies are controlled by our USA FCC. Please be informed of the Federal Communications Commission Notice of Proposed Rule Making (NPRM - PR Docket 92-235) which, if implemented, will have a profound effect on model radio controlled aircraft frequency control use. Developed by the FCC Land Mobile Service, it creates a massive frequency restructuring - the first of its type in 60 years. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left, to safely utilize, if these new rules are adopted.

The above information above was given to me January 12th at my regular North Alabama Radio Control Association meeting. My love of public music education is closely related to my personal hobby of building and flying model radio controlled aircraft. My childhood desire to fly became a reality in 1957 because one retired gentleman from Decatur Alabama, took the time to "teach" me the skills of the hobby. I have been teaching this hobby to others since I acquired the necessary talents and hobby equipment to do so.

I estimate that I have spent some \$25,000 dollars on the purchase of radio control electronics, model airplane, helicopter kits & other hobby related supplies. My national model organization, the Academy of Model Aeronautics, has helped acquire radio frequencies since 1936.

Please feel free to contact the Technical Department at the Academy of Model Aeronautics Headquarters for additional

information - (709)495-0750, ext. 264 for further
explanation of this FCC JANUARY 26th RULING.

Please help me continue the safe enjoyment of my hobby
by using your influence to persuade the FCC not to carry out
its proposals for the 72-76 MHz radio band.

God bless you for serving our great nation and the
wonderful state of Alabama.

Sincerely,

A handwritten signature in cursive script that reads "Don Peck".

Don Peck
1311 Oster Dr NW
Huntsville, Al 35816

(205) 539-5217

January 15, 1993

The Honorable Bud Cramer
U.S. House of Representatives
Washington, DC 20515

JAN 26 1993

Dear Mr. Cramer,

I am an active competitor in radio control airplane competition. Over the past 15 years in this hobby I have spent many hundreds of hours building and flying radio controlled aircraft. My equipment investment is several thousands of dollars. As you can see this is a very important hobby to me.

Also I am a Leader Member and Licensed Contest Director in the Academy of Model Aeronautics which is the sanctioning body for our hobby and competition. It is my responsibility to voice concerns for safety related issues that may effect the safe operation of our models.

The concern I have is on the proposed rule change by the FCC, PR Docket 92-235, dealing with reallocating the 72 and 75 Mhz frequency band. Inserting channels so closely to the channels that we operate our radio controlled aircraft with will cause direct interference and loss of control. This could result in the loss of life and considerable damage to property. The frequency change proposal is for mobile communications equipment which means that we could not monitor a transmitter approaching our flying area. No warning could be given to the model aircraft pilot so that they could take action to prevent an accident.

At the present time we are safely operating with private land dispatch operations without any problems. This is because consideration was given to the channels that we operate on. This new proposal would put new channels between the currently used ones. The frequencies would be so close to ours that interference and resulting loss of control would certainly happen.

I strongly urge you to not adopt the proposed frequency change, PR Docket 92-235, that would obsolete a very large portion of radio equipment owned by radio control hobbyist across the country and pose a serious safety risk to others.

Sincerely yours,

Timothy A. Bath

January 19, 1993

Repr. Bud Cramer
U. S. House of Representatives
Washington, DC 20515

JAN 20 1993

Representative Cramer,

At the last meeting of the Radio Control Model Airplane Club of which I am a member (North Alabama Radio Control Association (NARCA)) an announcement was made about the Federal Communications Commission considering a rules change that would reduce the availability of frequencies currently assigned for model use and also increase the risk of accidents while flying model aircraft.

The FCC proceeding is PR Docket 92-235. This proceeding would create more land mobile frequencies and move the created frequencies closer to the radio control frequencies and thus cause interference to radio control frequencies. Of the 50 radio control frequencies presently available only 19 will be left if these new rules are adopted.

Our Radio Control Model Airplane flying club goes to great effort to insure the safety of all when flying our model aircraft. A lot of that effort is in the coordination of the use of radio control frequencies (no one can use a frequency that is being used by another flyer). I will leave it to your imagination to what would happen if two flyers were flying two aircraft at the same field on the same frequency. As a minimum it would mean the destruction of one of the aircraft. Radio interference from other sources could mean property damage as well as physical injury. Model aircraft can weigh as much as 25 pounds and travel up to 60 miles per hour. An object that large traveling that fast can inflict great damage to what it hits.

I personally derive great pleasure from building and flying model aircraft. I have been interested in flying for many years and have a considerable investment in time and money in my model aircraft. For the FCC to render over half of our frequencies unusable I think would be unwise. The hobby provides many hours of relaxation for many persons. If the FCC reduces the usable number of frequencies it would restrict the availability of usable radio control frequencies.

I would request your support in defeating PR Docket 92-235 (leave the modeling frequencies as they are now).

Respectfully,

John A. Calvert
178 Crystal Creek Dr.
New Market, AL 35761

COMODEL.C99

Rollin K. Keszler
110 Silver Creek Circle
Madison, Alabama 35758

JAN 29 1993

January 19, 1993

The Honorable Congressman Bud Cramer
1318 Longworth Building
Washington D. C. 20515

Dear Mr. Cramer:

I am an active builder and operator of radio-controlled model aircraft and have found it to be an excellent method of teaching engineering and scientific concepts to children, as well as a relaxing hobby for myself. Bringing complicated abstract ideas within reach of understanding by young minds is rewarding to me and, I am convinced, of benefit to our society.

I am very concerned about the proposed rule that is currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rule will greatly reduce the usability of frequencies currently assigned for radio-controlled model use and increase the risk of accidents and attendant liability.

Our radio-controlled frequencies are in the 72-76 MHz band, which is primarily used for private land mobile dispatch operations. However, our radio-control frequencies in this band are enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

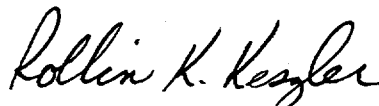
The Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of the rules with a new Part 88. Part 90 allows for safe use of radio-controlled aircraft and surface models by keeping 10 KHz spacing between fixed commercial users and frequencies used by radio-control enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 KHz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band (for aircraft models) and 10 of the 30 frequencies on the 75 MHz band (for car and boat models) now used by hobbyists. In fact, more channels will likely be affected.

When we operate our radio-controlled models, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio-control frequencies. Our equipment has been designed to operate safely without interfering with other frequencies with the 10 KHz spacing now in use. The 2.5 KHz spacing proposed by the new Part 88 will increase the possibility of interference from adjacent frequencies by overwhelming the ability of our equipment to separate the unwanted signals of adjacent frequencies from the signals of our equipment. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

I do not think it is wise of the FCC to seek to expand the operation conditions of land mobile radio users at the expense of radio-control modelers. The FCC may not think we are as important as business users of radio, but we modelers have a considerable investment in our equipment. It is a sizable industry that must be saved from these detrimental FCC actions. The hobby provides many hours of enjoyment to hundreds of thousands of people like myself and contributes to the advancement and development of the commercial aviation industry and to the education of young minds as well.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposal in PR Docket 92-235 for the 72-76 MHz band. We need your help urgently because the FCC has a deadline of February 26, 1993, after which it may become more difficult in halting these proposals from going into effect.

Respectfully,

A handwritten signature in cursive script that reads "Rollin K. Keszler". The signature is written in dark ink and is positioned above the printed name.

Rollin K. Keszler